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Attorneys for American Express Travel Related Services Company, Inc.

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re	) Chapter 11 Case No.
LEHMAN BROTHERS HOLDINGS INC., et al.,	) 08-13555 (JMP)
Debtors.	) (Jointly Administered)

CERTIFICATE OF NO OBJECTION UNDER 28 U.S.C. § 1746
REGARDING NOTICE OF MOTION PURSUANT TO BANKRUPTCY
RULE 9019(b) FOR APPROVAL OF SETTLEMENT AGREEMENT
BETWEEN BARCLAYS CAPITAL INC. AND
AMERICAN EXPRESS TRAVEL RELATED SERVICES COMPANY, INC.

TO THE HONORABLE JAMES M. PECK UNITED STATES BANKRUPTCY JUDGE:

Pursuant to 28 U.S.C. § 1746, and in accordance with this Court's case management procedures set forth in the Amended Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rules 1015(c) and 9007 Implementing Certain Notice and Case Management Procedures [Docket No. 2837], dated, February 13, 2009 (the "Amended Case Management Order"), the undersigned hereby certifies as follows:

On October 5, 2009, American Express Travel Related Services
 Company ("American Express") filed a motion pursuant to Bankruptcy Rule 9019(b) for

approval of settlement agreement between Barclays Capital Inc. and American Express
Travel Related Services Company, Inc. (the "Motion"). [Docket No. 5337]. The Motion
was served in accordance with the procedures set forth in the Amended Case Management
Order on (i) counsel for the Lehman Brothers Holding Inc, (ii) counsel for James W.
Giddens, Trustee for the SIPA Liquidation of Lehman Brothers Inc., (iii) the United States
Trustee for the Southern District of New York; (iv) counsel for the Official Committee of
Unsecured Creditors; (v) counsel to Barclays Capital Inc. ("Barclays"); and (vi) all parties
who have requested notice in these chapter 11 cases.

- 2. The Motion set October 23, 2009, at 4:00 pm (New York Time) as the deadline for parties to object or file a response to the Notice of Motion (the "Objection Deadline").
- 3. The Amended Case Management Order provides that pleadings may be granted without a hearing, provided that no objections have been filed prior to the Objection Deadline and the attorney for the entity who filed the pleading complies with the relevant procedural and notice requirements.
- 4. The Objection Deadline has now passed and, to the best of my knowledge, no objections or other responsive pleadings to the Motion have been filed with the Court on the dockets of the above-referenced cases in accordance with the procedures set forth in the Amended Case Management Order, nor has any objection or other responsive pleading with respect to the Motion been served upon Crowell & Moring LLP.

- 5. Accordingly, for the reasons set forth in the Motion, American Express respectfully requests that the proposed order, annexed hereto as Exhibit A, and unmodified since its filing on October 5, 2009, be entered in accordance with the procedures described in the Amended Case Management Order.
  - 6. I declare that the foregoing is true and correct.

Dated: October 26, 2009 New York, New York

Respectfully submitted,

/s/ Steven B. Eichel
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